

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

IN RE: *EX PARTE* APPLICATION OF
LAURA ZÚNIGA CÁCERES, BERTHA
ZÚNIGA CÁCERES, AND SALVADOR
ZÚNIGA CÁCERES FOR ASSISTANCE
BEFORE A FOREIGN TRIBUNAL

CASE NO.: 1:19-mc-00405-LG-RHW

**APPLICANTS' REPLY TO RESPONSE TO MOTION FOR LEAVE TO FILE REPLY
IN SUPPORT OF *EX PARTE* APPLICATION PURSUANT TO 28 U.S.C. § 1782**

Applicants do not concede the accuracy or merit of any of the arguments or assertions made or insinuated in the Response to Applicants' Motion for Leave to File a Reply Brief in Support of Their Section 1782 Application filed by Ms. Romero-Baca (Dkt. No. 24).

Applicants intend to file no further argument or evidence in support of their Motion for Leave to File Reply in Support of *Ex Parte* Application of Laura Zúniga Cáceres, Bertha Zúniga Cáceres, and Salvador Zúniga Cáceres for Discovery for Use in a Foreign Tribunal Pursuant to 28 U.S.C. § 1782 (Dkt. No. 23).

Dated: September 18, 2019

Respectfully submitted,

By: /s/ Amelia S. McGowan
Amelia S. McGowan

MISSISSIPPI CENTER FOR JUSTICE
Amelia S. McGowan, MSB# 103610
5 Old River Place, Suite 203 (39202)
P. O. Box 1023
Jackson, Mississippi 39215
Telephone: (769) 230-8003
Facsimile: (601) 352-4769
Email: amcgowan@mscenterforjustice.org

(Continued on next page.)

OF COUNSEL:

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

Leo P. Cunningham *Admitted Pro Hac Vice*

Ralitza S. Dineva *Admitted Pro Hac Vice*

Sean P. Killeen *Admitted Pro Hac Vice*

650 Page Mill Road

Palo Alto, California 94304-1050

Telephone: (650) 493-9300

Facsimile: (650) 565-5100

Email: lcunningham@wsgr.com

rdineva@wsgr.com

skilleen@wsgr.com

INTERNATIONAL HUMAN RIGHTS LAW
CLINIC, UNIVERSITY OF CALIFORNIA
BERKELEY

Roxanna Altholz *Admitted Pro Hac Vice*

489 Simon Hall,

Berkeley, California 94720

Telephone: (510) 643-8781

Facsimile: (510) 643-4625

Email: raltholz@law.berkeley.edu

Attorneys for Applicants

Laura Zúniga Cáceres, Bertha Zúniga

Cáceres, and Salvador Zúniga Cáceres